

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CAROLINE ANGULO, a single person, ERIC KELLER, a single person, EBEN NESJE, a single person, KIRK SUMMERS, a single person, CHRISTINE BASH, individually and as personal representative of the ESTATE OF STEVEN BASH, RAYMOND SUMERLIN JR. and MARYANN SUMERLIN, a married couple, and MARTIN WHITNEY and SHERRYL WHITNEY, a married couple,

Plaintiffs,

v.

PROVIDENCE HEALTH & SERVICES – WASHINGTON, a non-profit Washington corporation, also d/b/a PROVIDENCE ST. MARY MEDICAL CENTER; DR. JASON A. DREYER, D.O., and JANE DOE DREYER, husband and wife and the marital community thereof; DR. DANIEL ELSKENS, D.O., and JANE DOE ELSKENS, husband and wife and the marital community thereof; and JOHN/JANE DOES 1-10, and any martial communities thereof,

Defendants.

No. 2:22-cv-00915-JLR

STIPULATED MOTION AND  
[PROPOSED] ORDER TO  
ESTABLISH BRIEFING  
SCHEDULE FOR PLAINTIFFS'  
AMENDED MOTION TO  
REMAND

NOTE ON MOTION CALENDAR:  
March 28, 2024

STIPULATED MOTION AND [PROPOSED] ORDER  
TO ESTABLISH BRIEFING SCHEDULE FOR  
PLTFS.' AMEND. MOT. TO REMAND - 1  
(2:22-cv-00915-JLR)

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**STIPULATED MOTION**

The Court's March 25, 2024 Order granting Plaintiffs' Motion for Leave to File an Amended Motion for Remand set an April 4, 2024 deadline for Plaintiffs to file their renewed remand motion but permitted the parties to agree to an alternative briefing schedule for the motion. Dkt. 160 at 8 n.3 ("This order does not prohibit the parties from filing a stipulation and proposed order setting an agreed briefing schedule for Plaintiffs' amended motion to remand."). Accordingly, the parties stipulate and request that the Court approve the following briefing schedule for Plaintiffs' renewed remand motion.

1. Plaintiffs will file their Amended Motion for Remand on or before April 11, 2024, with the motion noted for consideration on May 3, 2024.

2. Defendants will file any opposition briefs to Plaintiffs' motion on or before April 29, 2024.

3. Plaintiffs will file any reply brief(s) on or before May 3, 2024. Should Defendants file multiple opposition briefs, Plaintiffs intend to file multiple reply briefs. However, Plaintiffs do not intend to file a reply brief in response to any non-substantive joinder that any Defendant files in support of another Defendant's opposition brief.

In addition, the parties request that the court re-note consideration of Plaintiffs' amended motion for class certification (Dkt. 132) and Providence Health & Services – Washington's cross-motion to strike class allegations (Dkt. 136) for May 3, 2024.

IT IS SO STIPULATED

RESPECTFULLY SUBMITTED this 28th day of March, 2024.

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Services – Washington

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STIPULATED MOTION AND [PROPOSED] ORDER  
TO ESTABLISH BRIEFING SCHEDULE FOR  
PLTFS.' AMEND. MOT. TO REMAND - 2  
(2:22-cv-00915-JLR)

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**[PROPOSED] ORDER**

It is so ordered.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
THE HONORABLE JAMES L. ROBART  
UNITED STATES DISTRICT JUDGE

STIPULATED MOTION AND [PROPOSED] ORDER  
TO ESTABLISH BRIEFING SCHEDULE FOR  
PLTFS.' AMEND. MOT. TO REMAND - 3  
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